

Ames Research Center Moffett Field, California 94035

May 11, 2020

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Subject: Continuing Section 106 Consultation for the Moffett Federal Airfield (MFA) Hangar 3

Hazard Remediation Project at NASA Ames Research Center, Moffett Field, Santa Clara

County, CA (NASA 2019 1216 001)

Dear Ms. Polanco,

Thank you for your letter dated January 23, 2020, in response to the initiation request for Section 106 Consultation for the Hangar 3 Hazard Remediation Project (formerly referred to as the Hangar 3 Demolition Project) at NASA Ames Research Center, Moffett Field, Santa Clara County, California.

As part of ongoing Section 106 consultation, NASA ARC has delineated an Area of Potential Effects (APE), identified historic properties in the APE, and assessed potential effects on the historic properties based on technical studies conducted by cultural resources specialists who meet the Secretary of the Interior's Professional Qualification Standards (48 Federal Register 44738). Stantec Consulting Services, Inc. (Stantec) prepared the *Moffett Federal Airfield Hangar 3 Hazard Remediation Project Section 106 Technical Report* (Technical Report). The Technical Report provides a description of the Undertaking, a map and narrative description of the APE, identifies the historic properties in the APE, and provides an analysis of the Undertaking's effects on historic properties under the Criteria of Adverse Effects per 36 CFR 800.5(a)(1). The Technical Report is provided with this correspondence for your review.

The APE (see Figure 4 of the Technical Report) includes the Project footprint immediately surrounding Hangar 3 and also encompasses the extent of potential visual effects resulting from the demolition of Hangar 3. The APE includes a large portion of the NRHP-listed Naval Air Station (NAS) Sunnyvale Historic District and its NRHP-eligible expanded district boundary. Additionally, the APE includes an area east of MFA in Sunnyvale, California. Given the nature of the Undertaking, the APE accounts for direct effects on historic properties in the Project footprint, including Hangar 3, Hangar 2, Building 55, and

aircraft parking apron MF1002, and indirect effects on historic properties throughout the APE, primarily contributors to the NAS Sunnyvale Historic District, that may be affected by the removal of a prominent district contributor and visual fixture in the district's setting.

Identified historic properties in the APE include Hangar 3, Hangar 2, Building 55, MF1002, and 20 other contributors to the NAS Sunnyvale Historic District (see Table 2 in Technical Report). All of these contributors are listed in the NRHP or have been previously determined or treated as eligible for the NRHP. In addition, a potential historic property was identified in the APE. The Lockheed Martin Missile and Space Division Campus is a highly secured facility that has been an important center for research and development, and manufacturing of advanced aviation and defense technologies since the 1960s. Due to the restricted nature of the facility and the low potential for adverse effects to compromise its integrity, it was not fully evaluated for the NRHP. For the purposes of Section 106 consultation for this Undertaking, NASA ARC proposes to treat the Lockheed Martin Missile and Space Division Campus as a historic property that is potentially eligible for listing in the NRHP without a formal determination of eligibility.

NASA ARC has determined that the Undertaking will result in adverse effects. Adverse effects include the loss of Hangar 3 and substantial visual and spatial changes that would diminish the integrity of the NAS Sunnyvale Historic District, particularly its aspects of setting and feeling. Several district contributors, specifically Hangar 2 and Building 55, as well as other contributors, would be adversely affected by the loss of Hangar 3. While Hangar 3 would no longer be eligible for listing in the NRHP, the NAS Sunnyvale Historic District, as a whole, would remain eligible for listing in the NRHP, although with diminished integrity.

The Technical Report proposes potential mitigation measures to resolve adverse effects. While the list of mitigation measures is preliminary in nature, the proposed measures are intended to inform future discussions in the Section 106 consultation process. The Technical Report also includes updates regarding efforts to identify and confirm interested and consulting parties. As outlined in the Technical Report, formal letters to assess interest were submitted to the potential interested parties identified in the original December 23, 2019 initiation letter. However, given current circumstances that may impact access to physical mail, digital follow-up efforts to confirm the interested and consulting parties for this Undertaking are underway. Updates that outline these efforts and a confirmed list of interested and consulting parties will be provided in a subsequent submission.

NASA ARC requests the SHPO's concurrence with its determination of eligibility on the historic properties identified in the APE, including the proposal to treat the Lockheed Martin Missile and Space Division Campus as an NRHP-eligible historic property for the sole purposes of this Section 106 consultation, and with its Finding of Adverse Effect related to this Undertaking, pursuant to 36 Code of Federal Regulations (CFR) 800.5(b). NASA ARC requests your response within 30 days of receipt of this letter, as specified in 36 CFR 800.5(c).

We would also appreciate any initial comments related to the potential mitigation measures included in the Technical Report. As previously requested, NASA ARC and Planetary Ventures, LLC, the Project proponent, wish to schedule a meeting with the SHPO to review the Project and discuss potential mitigation measures as part of the ongoing Section 106 consultation for this Undertaking. Due to current conditions, this can easily be accomplished through teleconference. Please let us know of upcoming availability after the review period.

Please contact me at jonathan.d.ikan@nasa.gov or at (650) 604-6859 with your comments or questions.

Sincerely,

Jonathan Ikan

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Cc:

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Enclosures: One (1) copy of the Section 106 Technical Report